

**IN THE UNITED STATES DISTRICT COURT FOR THE**  
**NORTHERN DISTRICT OF OHIO**  
**EASTERN DIVISION**

I, JASON PARILLO, DO HEREBY DEPOSE AND SAY:

1. I am a United States Postal Inspector, employed by the U.S. Postal Inspection Service (USPIS) since July of 2016, and currently assigned to Cleveland, Ohio, Field Office. I am a sworn Federal law enforcement officer empowered to investigate criminal activity involving or relating to the U.S. Postal Service (USPS) and/or U.S. Mail. I am currently assigned to the Prohibited Mail Narcotics team, which investigates the mailing of illegal narcotics, dangerous drugs, and their proceeds. I have received training in the detection and investigation of prohibited mailing offenses. Over the past two years, I have also worked in conjunction with the Homeland Security Investigations (HSI) and the Border Enforcement Security Taskforce (BEST) on cases involving illegal narcotics mailed from foreign countries.
2. As a Postal Inspector, I have also conducted online investigations, analyzed pen register and telephone toll data, analyzed financial records, executed controlled deliveries of controlled substances, interviewed witnesses, drafted and executed search warrants, seized illegal drugs and other evidence of drug violations in physical and electronic sources, processed seized evidence, and debriefed persons arrested and convicted of drug trafficking offenses regarding their illegal activity.
3. Through investigation and training, I have become familiar with the types and amounts of profits made by drug traffickers and the methods, language, and terms that are used to disguise their illegal activity. I know that persons engaged in drug trafficking require expedient forms of communication to maintain an adequate and consistent supply of drugs from sources, and to effectively market those drugs to customers.

4. I know, based on training and experiences, that those individuals who traffic in one controlled substances such as COCAINE often traffic and possesses other controlled substances and controlled substance analogues, particularly synthetic narcotics.
5. This Affidavit is offered in support of a Criminal Complaint against RAFAEL ERNESTO DONES ROSA for violations of Title 21, United States Code, Section 841(a)(1), Possession of a controlled substance with the intent to distribute; Title 21, United States Code, Section 846, Conspiracy to distribute and to possess with the intent to distribute a controlled substance; and Title 21, United States Code, Section 843(b), Illegal use of the mail and/or communication facility. As further detailed below, I submit that there is probable cause to believe that from on or about April 1, 2019 until on or about April 4, 2019, RAFAEL ERNESTO DONES ROSA did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of the cocaine, possessed cocaine with the intent to distribute, and illegally used the mails.
6. The facts set forth below are based upon my personal knowledge learned through the course of the investigation, as well as information obtained from law enforcement and additional sources.
7. This Affidavit is submitted for the limited purpose of informing the court of the evidence establishing probable cause for a violation of federal criminal law. Since this Affidavit is for this limited purpose, I have not included each and every fact known concerning this investigation.

**FACTS AND CIRCUMSTANCES REGARDING PROBABLE CAUSE**

8. On or about April 1, 2019, while doing interdiction of parcels that had been mailed via the United State Parcel Service departing from San Juan, Puerto Rico, Postal Inspectors identified the U.S. Postal Service Priority Mail parcel bearing label no. 9505516209469091327645 addressed to John Cruise, 205 Greeley Ln., Youngstown, OH 44505-4823, with a return address of Carlos Santos, PMB 339 267 Calle4 Sierra Milla, San Juan, PR 00926 as a parcel of interest because the listed name of the sender, "Calos Santos," was not associated with the return address listed on the parcel, per a government database ("the Subject Parcel"). The Subject Parcel is further described as a white U.S. Postal Service Priority Medium Flat Rate box, weighing approximately 9 pounds 4.8 ounces. The Subject Parcel was mailed on April 1, 2019 from the, San Juan, PR Post Office 00936 and bore \$14.35 in U.S. Postage.
9. On or about April 1, 2019, Postal Inspectors in San Juan, Puerto Rico express mailed the Subject Parcel to the USPIS Cleveland Field Office, in Cleveland, Ohio.
10. On or about April 3, 2019, I received the Subject Parcel at the Postal Inspection Service Cleveland Field Office.
11. That same date, I made inquiries with CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone-number information, concerning the subject delivery address and was unable to associate the name John Cruise with the delivery address of 205 Greeley Ln., Youngstown, OH 44505-4823. Using CLEAR, I was also unable to associate the name Carlos Santos with the return address of PMB 339 267 Calle4 Sierra Milla, San Juan, PR 00926.
12. On or about April 3, 2019, the Subject Parcel was placed into a lineup containing several empty parcels, which emanated no narcotics odors. A Cuyahoga County Sheriff

Narcotic detection canine examined the lineup and, according to the narcotic detection canine handler, alerted to the Subject Parcel, indicating that the parcel contained the odor of a controlled substance.

13. On or about April 3, 2019, I obtained and executed a federal search warrant (1:19mj3108) on the Subject Parcel. The Subject Parcel's contents were then inventoried and photographed, and included approximately 2 pounds 8 ounces of field tested positive cocaine, which had been concealed within multiple layers of plastic wrap, cleaning product wipes and black latex like substance, all found inside a large candle.

14. On or about April 4, 2019, Postal Inspectors and the Mahoning County Drug Task Force (MCDTF) planned a controlled delivery of the Subject Parcel to the delivery address of 205 Greeley Ln., Youngstown, OH 44505. A Detective on the MCDTF obtained a state anticipatory search warrant through the Mahoning County Court for the delivery address.

15. In anticipation of the controlled delivery, Postal Inspectors removed the original contents from the Subject Parcel and placed approximately 28 grams of the field-tested positive cocaine as a representative sample along with a GPS unit that would allow law enforcement to track the movement of the Subject Parcel. Law enforcement placed the GPS unit and representative sample inside a make-shift wooden block, which was the approximate size of the original contents. The wooden block was wrapped in black tape and placed back into the Subject Parcel, along with a parcel beacon, which would transmit a signal to law enforcement if the Subject Parcel were opened. The representative sample and law-enforcement equipment were placed back in the Subject Parcel. In preparation for the controlled delivery, law enforcement also sprayed the Subject Parcel's inner part with clue spray, which illuminates under black light and would transfer to an individual who touches the Subject Parcel's contents or inner

parts.

16. On or about April 4, 2019, at approximately 12:30 PM, a Postal Inspector acting in an undercover capacity as a U.S. Postal Service Letter Carrier obtained a U.S. Postal Service vehicle and drove the Subject Parcel to the delivery address. The Postal Inspector approached the residence on foot and knocked on the door of the residence. A Hispanic male, later identified as RAFAEL ERNESTO DONES ROSA, answered the door of the residence. The Postal Inspector, who was on a live transmission with law enforcement, stated, "I have a box for John Cruise. Is that you?" ROSA replied, "Yes." ROSA then took possession of the Subject Parcel and went back into the residence. The Postal Inspector returned to the U.S. Postal Service vehicle and departed the area. The Subject Parcel was scanned delivered remotely by a Postal Inspector in Cleveland, Ohio.

17. About 10 minutes later, law enforcement received a signal from the parcel beacon placed inside the Subject Parcel that it had been opened. Law enforcement approached the residence and executed the anticipatory search warrant of the residence. Upon entry into the residence, law enforcement found ROSA in the residence's basement level placing the make-shift wooden block containing the representative sample and GPS unit in the residence's rafters, attempting to hide it from law enforcement. Upon searching the residence, law enforcement found the Subject Parcel box containing the parcel beacon stuffed above a heating duct in an adjacent room in the residence's basement.

18. Law enforcement interviewed ROSA at the residence. Law enforcement read ROSA his rights per Miranda and asked ROSA if he understood. ROSA nodded his head, indicating he understood and said, "Yes." ROSA then claimed to not know English and spoke Spanish. A Spanish translator was called and arrived at the residence. ROSA was again verbally read his rights per Miranda, which was translated

to him in Spanish by the translator. ROSA verbally acknowledged that he understood his rights. ROSA then admitted to taking the parcel from the undercover Postal Inspector and acknowledged that he recognized the Inspector from earlier in the day. ROSA also admitted to opening the parcel. ROSA stated he did not know what was in the parcel, but had been curious and opened it. ROSA was asked if law enforcement could use a black light to look at his hands. ROSA agreed and opened his hands. A black was used to illuminate the clue spray, which had been sprayed on the contents of the subject parcel. The black light revealed the spray had gotten on ROSA's hands.

ROSA initially gave verbal consent to his Samsung cell phone to law enforcement, but rescinded his consent when later asked to acknowledge his consent in writing. At this point, ROSA asked to speak to a lawyer. At this time, law enforcement stopped questioning ROSA, and ROSA was arrested.

19. For the foregoing reasons, I submit that there is probable cause that RAFAEL ERNESTO DONES ROSA committed the following federal offenses: Title 21, United States Code, Section 841(a)(1), Possession of a controlled substance with the intent to distribute; Title 21, United States Code, Section 846, conspiracy to distribute and to possess with the intent to distribute a controlled substance; and Title 21, United States Code, Section 843(b), Illegal use of the mail and/or communication facility.

  
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JASON PARILLO  
POSTAL INSPECTOR

SUBSCRIBED AND SWORN TO BEFORE ME  
THIS 5th DAY OF APRIL, 2019, AT  
YOUNGSTOWN, MAHONING COUNTY, OHIO

  
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GEORGE J. LIMBERT  
U. S. MAGISTRATE JUDGE